



March 16, 2022

Hon. Paul A. Engelmayer
United States District Court
Southern District of New York
40 Foley Square, Room 2201
New York, NY 10007

Norton Rose Fulbright US LLP
2200 Ross Avenue, Suite 3600
Dallas, Texas 75201-7932
United States

Richard S. Krumholz
Global Head of Litigation and Disputes
Direct line +1 214 855 8022
richard.krumholz@nortonrosefulbright.com

Tel +1 214 855 8000
Fax +1 214 855 8200
nortonrosefulbright.com

Re: *Securities and Exchange Commission v. AT&T Inc. et al.*, No. 21 Civ. 1951 (PAE) –
Joint Letter Motion to Modify Deadlines in Civil Case Management Plan and Scheduling Order

Dear Judge Engelmayer:

Plaintiff and Defendants (collectively, the “Parties”) write jointly to respectfully request that Your Honor enter the attached proposed Third Amended Civil Case Management Plan and Scheduling Order (the “Proposed Amendment”).

Specifically, the Proposed Amendment solely seeks a seven-day extension of expert discovery deadlines in order for the Parties to complete expert depositions. All other case deadlines, including for summary judgment briefing, shall remain the same.

Plaintiff has designated five experts and, pursuant to the Second Amended Civil Case Management Plan and Scheduling Order (Dkt. No. 61), Defendants shall designate their experts on March 18, 2022, Plaintiff shall serve rebuttal expert reports by April 7, 2022, and expert discovery closes on April 15, 2022. Extending the deadline for expert discovery by seven days—from April 15, 2022 to April 22, 2022—will provide the parties with more time to prepare for and to complete the numerous expert depositions. The Parties do not believe the Proposed Amendment will affect any other case deadlines; however, consistent with Your Honor’s Individual Practices and the Local Rules of the Court, the Parties reserve the right to request extensions to interim deadlines to the extent appropriate and necessary, while keeping the current deadline for the completion of summary judgment briefing intact.

Accordingly, the Parties believe that good cause exists for the current request and respectfully request Your Honor to enter the attached Proposed Third Amended Case Management Plan and Scheduling Order.

We remain available for a teleconference at Your Honor’s convenience if the Court wishes to discuss our joint request.

Norton Rose Fulbright US LLP is a limited liability partnership registered under the laws of Texas.

Norton Rose Fulbright US LLP, Norton Rose Fulbright LLP, Norton Rose Fulbright Australia, Norton Rose Fulbright Canada LLP and Norton Rose Fulbright South Africa Inc are separate legal entities and all of them are members of Norton Rose Fulbright Verein, a Swiss verein. Norton Rose Fulbright Verein helps coordinate the activities of the members but does not itself provide legal services to clients. Details of each entity, with certain regulatory information, are available at nortonrosefulbright.com.

March 16, 2022
Page 2

Very truly yours,

/s/ Richard S. Krumholz

Richard S. Krumholz
Counsel for Defendant AT&T Inc.

Randall W. Jackson
Counsel for Defendant AT&T Inc.
Jon Patton
Counsel for Defendants Messrs. Black, Evans, and Womack

Victor Suthammanont
Counsel for Plaintiff Securities and Exchange Commission

Attachment

Cc: All Counsel of Record (via ECF)